

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION
1:25CR _____

JUN 30 2025

US DISTRICT COURT
WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA)	<u>BILL OF INFORMATION</u>
)	
)	Violation: 18 U.S.C. § 1920
v.)	
)	
SANDRA "SANDY" CANNON THRONEBURG)	
_____)	

THE UNITED STATES ATTORNEY CHARGES:

INTRODUCTION

1. The Department of Labor ("DOL") is an agency of the executive branch of the United States of America and the Secretary of Labor is charged with the administration of the Federal Employees' Compensation Act ("FECA")(5 U.S.C. § 8101, *et seq.*). Pursuant to 20 C.F.R. § 10.1, the Secretary of Labor has delegated her authority to administer the FECA to the Director of the Office of Workers' Compensation Program ("OWCP") with the DOL.
2. The FECA establishes a comprehensive scheme under which federal workers, which includes United States Postal Service ("USPS") employees, receive benefits for employment-related injuries. Section 8106(b) of the FECA provides that OWCP may require a partially disabled employee to report his or her earnings from employment or self-employment in the manner and at such time as OWCP specifies.
3. On or about September 9, 1989, SANDRA "SANDY" CANNON THRONEBURG ("THRONEBURG") began working with the USPS as a rural carrier in Valdese, North Carolina. On or about September 8, 2015, THRONEBURG injured her right ankle and foot during the performance of her duties as a USPS employee.
4. THRONEBURG stopped working for the USPS because of her injury, and on October 23, 2015, she began receiving compensation benefits, in the form of medical benefits and disability compensation, under the FECA for her accepted medical condition. To continue receiving compensation benefits, THRONEBURG was obligated to report, among other things, all employment, self-employment, involvement in business enterprises, and volunteer work.

5. On or about September 24, 2020, THRONEBURG completed, signed and submitted a DOL OWCP Form EN1032 that contained materially false responses to questions about her employment status. Question 1 asked “Did you work for any employer during the past 15 months” and THRONEBURG answered “No.” Question 2 asked “Were you self-employed or involved in any business enterprise in the past 15 months” and THRONEBURG answered “No.” Question 3 asked “If you answered No to both questions 1 and 2, state whether you were unemployed for all periods during the past 15 months” and THRONEBURG stated “Yes.” She also denied receiving any type of money or other compensation for volunteer work during the last 15 months.

6. Contrary to statements made in the DOL OWCP Forms EN 1032 that THRONEBURG submitted, THRONEBURG had worked for and received monetary payments from RK Ervin Accountant, an accounting firm in Morganton, North Carolina, from 2016 to 2020. As part of her employment with RK Ervin Accountant, THRONEBURG performed clerical duties such as interacting with customers, taking messages, keying in data, and answering phones.

7. THRONEBURG failed to disclose to OWCP or USPS that she was employed by and receiving earned income from RK Ervin Accountant. She has received \$261,412.28 in workers compensation benefits, and OWCP has paid \$278,673.85 for THRONEBURG’s medical bills relating to her alleged medical condition.

COUNT 1

8. The United States Attorney realleges and incorporates by reference the Introduction in this Bill of Information.

9. On or about September 24, 2020, in Burke County, within the Western District of North Carolina, and elsewhere,

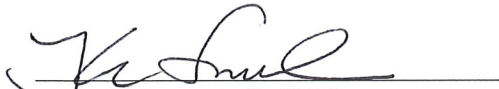
SANDRA “SANDY” CANNON THRONEBURG

knowingly and willfully made and used a false statement or report knowing the same to contain a false, fictitious or fraudulent statement or entry in connection with an application for or receipt of compensation or other benefit or payment under subchapter I or III of chapter 81 of Title 5, that

is, she submitted a DOL OWCP Form EN 1032 that read she had not worked for an employer during the past 15 months when, as she then knew, she had worked for RK Ervin Accountant.

In violation of Title 18, United States Code § 1920.

RUSS FERGUSON
United States Attorney


KENNETH M. SMITH
Assistant United States Attorney